

State Water Resources Control Board

September 7, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7017 2680 0000 6289 4794

Mr. Allen Keel
Chief Stationary Engineer
Wastewater Enterprises
San Francisco Public Utilities Commission
750 Phelps Street
San Francisco, California 94124
akeel@sfgwater.org

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM
LOCATED AT MISSION BAY PUMP STATION #6, 456 TERRY FRANCOIS
STREET, SAN FRANCISCO**

Dear Mr. Keel:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the UST at your facility on August 30, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

| No. | Violation | Tank | Start Date | Stop Date | Regulation |
|-----|---|------|-----------------|-----------|---|
| 1 | Failure to Maintain Facility Information – In CERS, the facility information needs to be updated to include the correct method of financial responsibility. | All | August 30, 2018 | Ongoing | 23 CCR 2711(a) |
| 2 | Failure to Maintain Monitoring Plan – In CERS, the monitoring plan needs to be updated to list “yes” for maintenance records and designated operator training. | All | August 30, 2018 | Ongoing | H&SC 25286(a); 23 CCR 2632 (d)(1), 2711(a)(9) |
| 3 | Failure to Maintain Financial Responsibility – The letter from the Chief Financial Officer was not available at the time of inspection. The Certificate of Financial Responsibility coverage period needs to be updated. | All | August 30, 2018 | Ongoing | 23 CCR 2711(a)(11), 2712(i) |

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

| No. | Violation | Tank | Start Date | Stop Date | Regulation |
|-----|--|------|-------------------|-------------------|-------------------------------|
| 4 | Failure to Meet Designated Operator (DO) Requirements – The June, July and August monthly DO inspection reports list the DO certification expiration date of June 8, 2018. | All | June 26, 2018 | Ongoing | 23 CCR 2715(b) |
| 5 | Failure to Perform DO Inspection – A monthly DO inspection report for November 2017 was not available at the time of inspection. The Annual Monitoring Certification testing report does not replace the required monthly DO inspection report. | All | November 1, 2017 | November 30, 2017 | 23 CCR 2715(c) |
| 6 | Failure to Maintain Maintenance Records Onsite – There was no repair record for the L-6 sensor that was documented on November 17, 2017, as “frozen and needs replacing.” | All | November 17, 2017 | Ongoing | H&SC 25293; 23 CCR 2712(b) |

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and San Francisco City & County Public Health Department within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly designated DO and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Ms. Rebecca Green
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
rebecca.green@waterboards.ca.gov

Local CUPA

Mr. Jin Tang
Senior Environmental Health Inspector
San Francisco City & County Department of
Public Health
1390 Market Street, Suite 210
San Francisco, California 94102
jin.tang@sfdph.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Ms. Paula Stewart
Program Manager
San Francisco City & County Public
Health Department
paula.stewart@sfdph.org

Mr. Jin Tang
Senior Environmental Health Inspector
San Francisco City & County Public
Health Department
jin.tang@sfdph.org